

4.0 CORRECTIVE ACTION FOR SOLID WASTE MANAGEMENT UNITS

The information provided in this section is submitted to address the Part B information requirements for solid waste management units (SWMU), in accordance with the New Mexico Administrative Code, Title 20, Chapter 4, Part 1, § 270.14(d), revised June 14, 2000. Because Technical Area (TA) 16 at Los Alamos National Laboratory (LANL) includes a relatively large area and contains numerous SWMUs that would not significantly impact or be impacted by the TA-16 Burn Ground, this section addresses only those SWMUs that are located at or in the immediate vicinity of the Burn Ground, as discussed below.

LANL uses the definition of a SWMU presented in "Module VIII: Special Conditions Pursuant to the 1984 Hazardous and Solid Waste Amendments to RCRA for Los Alamos National Laboratory, EPA I.D. NM0890010515" (U.S. Environmental Protection Agency, 1994), referred to as Module VIII. This definition states that SWMUs are "any discernible unit at which solid wastes have been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous waste. Such units include any area at or around a facility at which solid wastes have been routinely and systematically released."

Two of the SWMUs located at the TA-16 Burn Ground are the open burning (OB) units [SWMU Nos. 16-010(c) and (d)] addressed in this permit renewal application. These OB units are located near the Fish Ladder Drainage in the southern portion of the TA-16 Burn Ground. The topography around the OB units directs runoff towards the Fish Ladder Drainage; therefore, this drainage is the only area that could potentially be impacted by leaks or spills of HE waste from the OB units. Other SWMUs located at or in the immediate vicinity of the TA-16 Burn Ground and that may impact the Fish Ladder Drainage include the Former Burning Ground Structures [Consolidated SWMU No. 16-010(h)-99], the Sump-Fish Ladder [SWMU No. 16-003(o)], and the HE Filter Vessels [SWMU Nos. 16-010(e) and (f)]. Investigations to date suggest that releases from the Sump-Fish Ladder SWMU have been the major source of contaminants detected in the Fish Ladder Drainage.

Two SWMUs are located in the northern portion of the TA-16 Burn Ground. These SWMUs are the former locations of the Flash Pad (16-387) [SWMU No. 16-010(b)] and the Burning Ground [Consolidated SWMU No. 16-016(c)-99]. Another SWMU, Material Disposal Area (MDA P) [SWMU No. 16-018], is located just north of the Burn Ground near the south rim of Cañon de Valle. The topography around these SWMUs directs runoff towards Cañon de Valle.

Table 4-1 lists the SWMUs at and in the immediate vicinity of the TA-16 Burn Ground. Descriptions of the SWMUs listed in Table 4-1 are included herein as Supplement 4-1, which has been extracted from the TA-16 section of "The 2003 Solid Waste Management Unit Report" (LANL, 2003). These descriptions include, to the extent available, the unit type, general dimensions and structural descriptions, the dates of operation, and the wastes managed at the unit. Supplement 4-1 also includes the most current available information pertaining to releases of hazardous wastes or hazardous constituents from the units and results of sampling and analysis conducted to date. In addition, the location of each SWMU is presented on a topographic map included in Supplement 4-1.

Table 4-1
Technical Area (TA) 16
Solid Waste Management Units (SWMU)
at or in the Vicinity of the TA-16 Burn Ground

| SWMU No./Former SWMU No. | Consolidated SWMU No. | SWMU Description | Unit Status |
|---|-----------------------|---|---|
| 16-003(o) | | Physical/Chemical Treatment Unit (Sump-Fish Ladder) | Inactive; operated under National Pollutant Discharge Elimination System permit |
| 16-010(b) | | Open burning/open detonation (Flash Pad [16-387]) | Closure Approval Pending |
| 16-010(c) | | Open burning/open detonation (Burn Site 16-388) | Active, To Be Permitted |
| 16-010(d) | | Open burning/open detonation (Burn Site 16-399) | Active, To Be Permitted |
| 16-010(e) | | Physical/Chemical Treatment Unit (HE Filter Vessel [16-401]) | To Undergo Closure |
| 16-010(f) | | Physical/Chemical Treatment (HE Filter Vessel [16-406]) | To Undergo Closure |
| 16-005(g), 16-010(h), 16-010(i), 16-010(j), 16-010(k), 16-010(l), 16-010(m), 16-010(n) | 16-010(h)-99 | Outfall/effluent discharge; physical/chemical treatment unit; open burning/open detonation; wastewater treatment plant/waste lines (Former Burning Ground Structures) | Inactive |

Table 4-1 (Continued)
Technical Area (TA) 16
Solid Waste Management Units (SWMU)
at or in the Vicinity of the TA-16 Burn Ground

| SWMU No./Former SWMU No. | Consolidated SWMU No. | SWMU Description | Unit Status |
|------------------------------------|-----------------------|--|---|
| 16-006(e), 16-010(a), 16-016(c) | 16-016(c)-99 | Storage areas/waste piles/magazines; subsurface liquid disposal (Burning Ground) | Inactive; Voluntary Corrective Action Completed/ Approval Pending |
| 16-018 | | Material Disposal Area (MDA P) | Closure Approval Pending |